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December 7, 2004

BY HAND DELIVERY

Mr. Walter Thomas
Secretary
Alabama Public Service Commission
RSA Union Building
8th Floor
100 N. Union Street
Montgomery, Alabama 36104

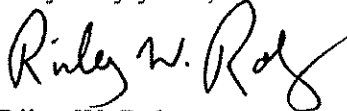


Re: Proposed Revisions to the Price Regulation and Local Competition Plan; Docket
No. 28590

Dear Mr. Thomas:

Enclosed for filing are the original and ten copies of the Reply Comments of
ITC^DeltaCom Communications, Inc., in the above-referenced matter.

Very truly yours,


Riley W. Roby

RWR:dpe
Enclosures

cc: Counsel of Record

In Re: Proposed Revisions to the)
Price Regulation and Local Competition) Docket 28590
Plan)

ITC^DeltaCom Communications Inc., d/b/a ITC^DeltaCom and d/b/a Grapevine ("DeltaCom"), pursuant to the Alabama Public Service Commission's ("Commission") *Order Seeking Comments On the Revised ATRP* ("Order") issued November 5, 2004, in the above-captioned matter, hereby submits these brief Reply Comments.

For the Commission's review and consideration, DeltaCom highlights the following areas of concern:

1). The Revised Alabama Telecommunications Regulation Plan (the “Revised ATRP”) does not include unbundled network elements (“UNE”) language that was a critical threshold requirement in the 1995 Price Regulation Plan. Should the Commission approve the Revised ATRP, the Commission should be clear that all existing Commission orders regarding UNE availability and pricing (including those provisions contained in the 1995 Price Regulation Order) continue in full force and effect until expressly modified in a future Commission Order. The FCC is expected to release new rules regarding the availability of UNEs in the near future and the Revised ATRP should not remove existing unbundling requirements. Deltacom recommends that the Commission include the following disclaimer in the Revised ATRP “[n]othing

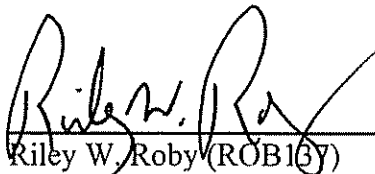
in this order is intended to alter any prior Commission decisions related to the availability and pricing of unbundled network elements by BellSouth consistent with state and federal law.”

2). Special access services, which are used by carriers to provide local services, should be capped at existing intrastate rates. Because the Revised ATRP recommends that switched access be capped at existing intrastate rates, DeltaCom recommends that the same methodology and policy considerations be applied to special access services as well.

II. Conclusion

In conclusion, DeltaCom respectfully requests that the Commission review and consider the two concerns described herein and appreciates the work undertaken by the Staff and this Commission in reaching a fair and equitable resolution for all carriers operating in Alabama.

Respectfully submitted this 7th day of December, 2004.

A handwritten signature in black ink, appearing to read "Riley W. Roby", is written over a horizontal line.

Riley W. Roby (ROB13Y)
One of the Attorneys for ITC^DeltaCom
Communications, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon the following individuals in this cause by placing the same in the U.S. Mail, postage prepaid and properly addressed this 7th day of December, 2004.

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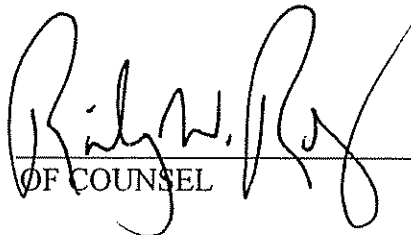
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